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April 10, 2025

VIA ECF

Honorable Jessica G.L. Clarke, U.S.D.J.
United States District Court
Southern District of New York
500 Pearl Street, Room 1040
New York, NY 10007

Re: Parker v. Bursor, 24-cv-245 (JGLC) (RFT)

Dear Judge Clarke:

This Firm, along with Judd Burstein, P.C., represents Defendants Scott Bursor and Bursor & Fisher, P.A. (collectively, "Defendants") in the above-referenced matter.

Pursuant to Your Honor's March 31, 2025 Opinion and Order (ECF No. 345 at 29), we write, jointly with counsel for Plaintiff Angelica Parker, to request "additional briefing regarding whether the Court may exercise general jurisdiction over B&F and Bursor," and propose the following schedule:

- On or before April 17, 2025, Plaintiff will submit additional briefing¹; and
- On or before April 24, 2025, Defendants may submit a responsive brief.

In addition, we enclose the Declaration of Scott A. Bursor, dated December 18, 2024, which is the declaration regarding jurisdictional discovery referenced in the Court's Opinion and Order. Concurrently herewith, Defendants are filing a letter motion seeking leave to file the declaration under seal because it contains sensitive financial and accounting information.

We thank the Court for its continued attention to this matter.

Respectfully submitted,

A handwritten signature in cursive script that reads "Christine A. Amalfe".

Christine A. Amalfe

cc: All counsel of record (via e-mail)

¹ As Plaintiff's briefing will make clear, it is her position that a decision regarding general jurisdiction is premature given that not a single deposition has taken place in this matter. At a minimum, certain B&F employees, as well as Mr. Bursor, need to be deposed.